

EXHIBIT 7
(Public)
(Previously File Under Seal as Dkt. 334)

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No.

16-cv-1054 (WMS/DTS)

PLAINTIFF,

VS.

FEDERAL INSURANCE COMPANY
and ACE AMERICAN INSURANCE
COMPANY,

DEFENDANTS.

VIDEOTAPED DEPOSITION OF

BROOKS HILLIARD

EXHIBIT

7

Taken June 19, 2019

By Brandi Bigalke, RPR

Fair Isaac Corporation vs. Federal Insurance Company, et al.

1 virtually illegible diagram to make that
 2 determination.
 3 He does identify some in the center
 4 as being core policy administration, but he
 5 doesn't identify which -- as far as I could tell
 6 by looking at it, which of the others may or may
 7 not be core.
 8 Q. What additional information would
 9 you need?
 10 A. I would need to know the
 11 functionality of each of the boxes and the little
 12 bubbles, like the one where it says -- hold on.
 13 For instance, under core administration front
 14 end, there's one that says turbo front end.
 15 There's another one that says book, another one
 16 that says bind.
 17 And I know what booking and binding
 18 are, but I would need to know detail at the level
 19 of what each of those identified modules is in
 20 order to -- more than just a name of the module,
 21 in order to answer that -- to give you an answer
 22 to your prior question.
 23 Q. So to go back to this issue about
 24 your opinion being that Blaze provided critical
 25 capability contributing to Federal's revenues, Page 197

1 can you quantify that in terms of a dollar amount
 2 or on a percentage basis or in any manner?
 3 MR. HINDERAKER: Objection; asked
 4 and answered.
 5 THE WITNESS: I have not attempted
 6 to quantify it. I don't have enough information
 7 to quantify it, but there's a direct line between
 8 the requirements in the RFI and the functionality
 9 described in the annual reports to see that
 10 there's a direct connection between what Blaze
 11 Advisor was acquired or licensed to do and the
 12 success of -- successful revenue increases that
 13 Chubb experienced in the areas identified in the
 14 RFI.
 15 BY MR. FLEMING:
 16 Q. Well, can you -- can you quantify
 17 that?
 18 You said that's what it was
 19 intended to do, but can you quantify on a dollar
 20 basis --
 21 MR. HINDERAKER: Objection; asked
 22 and answered.
 23 BY MR. FLEMING:
 24 Q. -- what the contribution was?
 25 A. No. Page 198

1 MR. HINDERAKER: Objection; asked
 2 and answered.
 3 BY MR. FLEMING:
 4 Q. Thank you. You also said you
 5 needed additional information to do that.
 6 What additional information would
 7 you need?
 8 A. That's not an -- you know, in order
 9 to answer that question, I'd have to look at that
 10 in much greater detail than I've looked at it.
 11 The -- what I was instructed to
 12 look into was is there a direct link between the
 13 Blaze functionality and the increased revenue.
 14 Not the amount of the increased revenue, but a
 15 direct -- a straight line between the
 16 functionality and the increased revenue. And
 17 that exists.
 18 In order to do the quantification,
 19 I haven't started to think of what additional
 20 work I'd have to do in order to determine that,
 21 and that might more be the province of an
 22 accounting expert rather than myself.
 23 Q. So you've made no attempt to
 24 quantify and you can't tell me today how you
 25 would go about quantifying it, if you choose to Page 199

1 do that, correct?
 2 A. I'm not sure that I would choose to
 3 do that. That was not the objective. That would
 4 be outside the scope of what I was asked to do.
 5 The scope of what I was asked to
 6 look into was just is there a direct causal
 7 relationship.
 8 Q. What is your understanding of the
 9 merger that took place involving the defendants
 10 in this case?
 11 A. That sometime during 2015 there
 12 were -- there was information made available
 13 publicly that Ace Limited was considering
 14 acquiring the Chubb Corporation, which I believe
 15 is the parent corporation of Federal Insurance.
 16 And then that acquisition took place late in
 17 January of 2016.
 18 Q. And could you tell me in detail
 19 what was the -- how was the merger effectuated,
 20 what was the status of the various companies post
 21 merger, the structure?
 22 A. I'm not sure I understand your
 23 question.
 24 Q. What was the structure of the
 25 various companies post merger? How were they Page 200